

From: [Kate Zimmerman](#)
To: [Rankin, Dennis - Washington, DC](#)
Subject: Scoping comments on proposed San Luis Valley-Calumet-Comanche Transmission Project (Tri-State)
Date: Monday, September 21, 2009 3:29:03 PM
Attachments: [NWF Scoping Comments Tri-State Transmission Project.pdf](#)

Attached please find comments on public scoping for the San Luis Valley-Calumet-Comanche Transmission Project proposed by Tri-State Generation and Transmission Association, Inc. See 74 Fed. Reg. 38391-92 (August 3, 2009).

NWF's mission is to inspire Americans to protect wildlife for our children's future.

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September 21, 2009

Delivered via electronic mail to dennis.rankin@wdc.usda.gov

Dennis Rankin, Environmental Protection Specialist
USDA Rural Utilities Service
1400 Independence Avenue SW, Stop 1571
Washington, D.C. 20250-1571

Re: Scoping for proposed San Luis Valley-Calumet-Comanche Transmission Project

Dear Mr. Rankin:

These comments are submitted on behalf of the National Wildlife Federation (NWF). The mission of NWF is to inspire Americans to protect wildlife for our children's future. Founded in 1936, NWF has more than four million members and supporters, including 47 state-level affiliate organizations throughout the United States and its territories. During the last seven decades, NWF's nationwide coalition of members, financial supporters, affiliates and business partners have brought a host of important issues to prominence at the local, state and national levels. These grassroots activists and wildlife enthusiasts are dedicated to winning lasting victories for wildlife, promoting conservation as an American value, and inspiring a new generation of conservationists.

Specifically, NWF's members use lands and resources that may be impacted by construction of the proposed transmission lines. Many of the suggested routes cross significant wildlife habitats important to NWF's members, including vital ranges for big game and flyways for migratory birds. Because of the potential impacts to these habitats, NWF believes that a full environmental impact statement (EIS) should be prepared before any decision is made authorizing construction of these new power lines.

I. GENERAL REQUIREMENTS APPLICABLE TO SCOPING AND THE PREPARATION OF AN ENVIRONMENTAL IMPACT STATEMENT

The “scoping” stage of preparing an EIS or environmental Assessment (EA) requires federal agencies, including Rural Utilities Service (RUS), to make two determinations: (1) what is the scope of the project to be analyzed and (2) what are the issues that will be analyzed “in depth” in the EIS or EA. 40 C.F.R. § 1501.7(a).

Regulations adopted by the Council on Environmental Quality (CEQ) require a reasonable range of alternatives to be presented and analyzed so that issues are “sharply defined” and “a clear basis for choice among options . . .” is provided. 40 C.F.R. § 1502.14. CEQ regulations and court decisions make clear that the discussion of alternatives is “the heart” of the National Environmental Policy Act (NEPA) process. Environmental analysis must “[r]igorously explore and objectively evaluate all reasonable alternatives.” Objective evaluation is compromised when agency officials bind themselves to a particular outcome or foreclose certain alternatives at the outset. RUS must use the scoping process to develop alternatives that emphasize needed environmental protection, for example, even if such alternatives limit and/or strongly regulate other actions.

RUS must bear in mind that the “primary purpose” of NEPA review is to “insure that the policies and goals defined in [NEPA] are infused into the ongoing programs and actions of the Federal Government.” 40 C.F.R. § 1502.1. The policies and goals of NEPA include:

Encouraging a “productive and enjoyable harmony between man and his environment,”
Promoting “efforts which will prevent or eliminate damage to the environment and biosphere,”
Using “all practicable means and measures . . . to create and maintain conditions under which man and nature can exist in productive harmony . . .,”
Fulfilling “the responsibilities of each generation as trustee of the environment for succeeding generations,”
Assuring “all Americans safe, healthful, productive and esthetically and culturally pleasing surroundings,”
Allowing beneficial use of the environment “without degradation . . . or other undesirable or unintended consequences,”
Preserving “important historic, cultural and natural aspects of our national heritage . . .,”
Achieving a “balance between population and resource use . . .” and
Enhancing “the quality of renewable resources” and maximizing recycling of depletable resources.

N-005-001 42 U.S.C. §§ 4321-4331. Thus, the issues that RUS must identify for analysis include the above goals and policies, and NWF asks the agency to “insure” that these considerations are “infused” into the alternatives considered as well as any project authorized in a final decision.

N-005-001: NEPA Process (In Review)

Your email/letter/comment form has been received and your comment noted. Tri-State Generation and Transmission Association, Inc. has requested financial assistance from the USDA Rural Utilities Service (RUS), for their anticipated ownership interest in the proposed San Luis Valley – Calumet - Comanche Transmission Project. RUS has determined that funding Tri-State’s ownership interest is a federal action requiring analysis under the National Environmental Policy Act (NEPA).

RUS is the lead federal agency for NEPA, and will consult with other federal, state, and local agencies, and affiliated tribes as well as adhere to applicable regulations.

Additional information regarding the NEPA process can be found on the RUS project website at <http://www.usda.gov/rus/water/ees/envIRON.htm>. The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

N-005-002

NEPA requires RUS to address a number of other factors that the agency should not overlook as it completes the scoping process for this project. NEPA requires RUS to “insure that presently unquantified environmental amenities and values” are given consideration. 42 U.S.C. § 4332, 40 C.F.R. § 1507.2. In analyzing this project, RUS should explicitly address those environmental values, such as fish and wildlife habitat, scenery and solitude, for which an economic price is not easily set.

N-005-003

Finally, the best available ecological information should be utilized. It is rarely possible to obtain perfect information; however, RUS should not allow this to pre-empt informed decision-making. The agency should gather the best information possible in all but the narrow range of exceptions permitted by CEQ’s regulations. *See* 40 C.F.R. § 1502.22. If RUS concludes that information is not essential to a reasoned consideration of alternatives, or the cost of obtaining the information is exorbitant, or the means for acquiring the information are unknown, RUS must nevertheless present “credible scientific evidence” on reasonably foreseeable significant adverse impacts (including low likelihood but catastrophic impacts) so that the impacts can be assessed based on approaches that are “generally accepted in the scientific community.” *See* 40 C.F.R. § 1502.22(b); *see also* 40 C.F.R. § 1502.24 (requiring professional and scientific integrity in an EIS).

A. Alternatives to the Proposed Project

N-005-004

In its draft of the West-wide Energy Corridor Programmatic Environmental Impact Statement, the Department of Energy acknowledged that “[a]lternatives calling only for increased energy efficiency of existing transport facilities and energy conservation by users could help alleviate concerns related to congestion and increased energy demand in the West.” Draft PEIS at 2-37.

N-005-005

With respect to the proposed project, NWF urges RUS to consider not just alternative routes for the proponents’ requested transmission lines but also alternative methods for meeting the identified need for the project, including generation through distributed facilities and improved conservation and efficiency. In its Alternative Evaluation Studies, project proponent Tri-State Generation and Transmission Association, Inc. (Tri-State) summarily rejects these alternatives. Tri-State concludes that neither “aggressive” load management nor “aggressive” conservation can meet peak power demands. However, Tri-State has never attempted to make the same “aggressive” investment in demand-side management or distributed energy that it has in the construction of new utility-scale generation and transmission facilities, including the proposed project. RUS must consider an alternative that would minimize or eliminate the need for construction of new transmission lines.¹

¹ RUS should also consider alternatives that include burying all or part of the proposed power lines, particularly in areas used by migratory birds.

N-005-002: Socioeconomic Resources (In Review)

Your email/letter/comment form has been received and your comment noted. Potential impacts to social and economic resources from the proposed project and mitigation measures will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

N-005-003: NEPA Process (In Review)

Your email/letter/comment form has been received and your comment noted. Tri-State Generation and Transmission Association, Inc. has requested financial assistance from the USDA Rural Utilities Service (RUS), for their anticipated ownership interest in the proposed San Luis Valley – Calumet - Comanche Transmission Project. RUS has determined that funding Tri-State’s ownership interest is a federal action requiring analysis under the National Environmental Policy Act (NEPA).

RUS is the lead federal agency for NEPA, and will consult with other federal, state, and local agencies, and affiliated tribes as well as adhere to applicable regulations.

Additional information regarding the NEPA process can be found on the RUS project website at <http://www.usda.gov/rus/water/ees/enviro.htm>. The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

N-005-004: Purpose and Need (In Review)

Your email/letter/comment form has been received and your comment noted. Project purpose and need will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

B. The Scope of the Proposed Project

In determining the scope of the analysis, RUS must consider “connected actions,” “cumulative actions,” and “similar actions.” 40 C.F.R. § 1508.25.

Connected actions include any reasonably foreseeable activities that would not occur “but for” the authorization provided to construct the proposed transmission lines. For example, are there generation facilities, for both renewable and non-renewable energy, that would not be constructed but for the availability of new transmission. Tri-State itself admits that “[a]dequate transmission capacity is a critical element necessary for the development of renewable energy projects in this area.”²

N-005-006 Similar actions include comparable activities in the geographic area of the project. For example, the environmental impacts of other existing or proposed power lines or pipelines on watersheds or wildlife habitat also impacted by the project must be addressed.

N-005-007 Cumulative actions are actions that, when combined, have significant impacts, even if the impact of each individual activity is minor. Impacts that should be addressed in a cumulative fashion include, but are not limited to: soil and vegetation disturbance, changed habitat structure, habitat fragmentation, and air or water pollution. Such cumulative impacts result from a number of activities including oil and gas development, subdivisions, and agriculture. RUS must examine both direct and indirect effects of these activities. 40 C.F.R. § 1508.25. For example, many of the suggested routes for the proposed transmission lines occur along streams. RUS must analyze the cumulative impact of the construction and maintenance of the proposed transmission lines together with the impact of other activities within the watershed on fish habitat and water quality.

C. Issues to be Analyzed in Depth

1. Wildlife resources

N-005-008 Many of the alternative corridors under consideration for the proposed transmission lines cross or border on vital wildlife habitats. RUS must analyze the potential impacts of the construction and maintenance of these power lines on wildlife. In particular, RUS must carefully evaluate the problem of habitat fragmentation and the need for maintaining the connectivity or linkage of habitats. Habitat fragmentation is strongly associated with the construction and maintenance of power lines and the road building that accompanies them. By altering the physical environment, the facilities modify animal behavior. Many species shift home ranges, change movement patterns and even reproductive and feeding behaviors to avoid roads, for example. Perhaps the most pervasive, yet insidious, impact of roads and other human corridors is providing easy access to natural areas and encouraging additional use and further development. More information on the impacts of roads on wildlife can be found at

²Tri-State, *San Luis Valley Electrical Improvement Project: Alternative Evaluation and Macro Corridor Study* (June 2008), p. 1-4.

N-005-005: Purpose and Need (In Review)

Your email/letter/comment form has been received and your comment noted. Project purpose and need will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

N-005-006: Connected Actions (In Review)

Your email/letter/comment form has been received and your comment noted. Potentially connected actions regarding other projects and mitigation measures in the study area will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in the summer of 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

N-005-007: Cumulative Impacts (In Review)

Your email/letter/comment card has been received and your comment noted. Potential cumulative impacts and mitigation measures will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

N-005-008: Wildlife (In Review)

Your email/letter/comment form has been received and your comment noted. Potential impacts to wildlife from the proposed project and mitigation measures will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in

<http://www.defenders.org/habitat/highways/new/ecology.html>, incorporated into these comments by this reference. RUS should limit habitat fragmentation resulting from the construction of new human corridors across vital wildlife habitats.

N-005-009 The necessary corollary to preventing habitat fragmentation is maintaining wildlife migration corridors and other ecological linkages. It is more effective to preserve existing corridors/linkages than to attempt to create new ones. It is, therefore, crucial that RUS identify all existing migration and other movement corridors, including those for migratory birds.³ RUS must ensure that actions it authorizes preserve the ecological integrity of these corridors and linkages. Big game migration routes have been widely documented, but riparian areas, mountain ranges and ridges, and other areas serve as important linkages among habitats (and even ecoregions) that must be preserved.

a. The National Wildlife Refuges

The San Luis Valley is home to three National Wildlife Refuges (NWRs), Alamosa, Monte Vista, and Baca. These NWRs provide crucial feeding, resting, and breeding habitat for over 200 bird species and a variety of other wildlife. Ninety-five percent of the Rocky Mountain population of Greater sandhill cranes stop twice a year at Monte Vista National Wildlife Refuge. Monte Vista NWR is also one of the most productive duck breeding wetlands in North America. Nesting shorebirds and water birds abound in all three Refuges. The riparian corridor along the Rio Grande at Alamosa NWR offers habitat for many species of songbirds, including the southwestern willow flycatcher. Short-eared owls winter and breed on the refuges. Bald eagles roost along the Rio Grande at Alamosa NWR. Mule deer and elk are found on the refuges year round, while migrating herds are seen in the fall and winter moving from higher elevations to the valley floor.

N-005-010 While the NWRs have been identified as “Exclusion Areas” for construction of the proposed transmission lines, potential impacts on the wildlife that frequent the refuges must still be addressed. This is particularly true of the cranes and other migratory birds for which power lines pose a significant threat.

2. Riparian areas

Wetlands are some of the most ecologically important landscapes. A significant proportion of Colorado’s wildlife either resides within riparian areas or utilizes them as an important component of their habitat. Riparian areas and wetlands provide rare oases of lush vegetation and water in an arid environment. They also improve water quality by filtering sediment and

³ Approximately 23,000 - 27,000 sandhill cranes migrate biannually through the San Luis Valley. Most of the Rocky Mountain Population of sandhill cranes breeds in the greater Yellowstone area and winter along the middle Rio Grande Valley on the Bosque del Apache NWR near Socorro, New Mexico and in Northern Mexico.

late 2010 and will be available at
<http://www.usda.gov/rus/water/ees/ea.htm>.

N-005-009: Wildlife (In Review)

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The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at
<http://www.usda.gov/rus/water/ees/ea.htm>.

N-005-010: Wildlife (In Review)

Your email/letter/comment form has been received and your comment noted. Potential impacts to wildlife from the proposed project and mitigation measures will be addressed in the Environmental Impact Statement.

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other pollutants, stem erosion, improve groundwater reserves, reduce the risk of flash flooding, and provide shelter for wildlife.

Because of the critical importance of these areas, two Executive Orders require their protection. Executive Order 11988 (1977) requires federal agencies to avoid adverse impacts associated with the occupancy of floodplains. Executive Order 11990 (1977) requires federal agencies to minimize the destruction, loss, or degradation of wetlands, and to preserve and enhance the natural and beneficial value of wetlands. All federally-approved activities must include all practical measures to minimize adverse impacts to wetlands and riparian areas.

3. Invasive species, noxious weeds, and management of native vegetation

Ground-disturbing activities, such as those associated with the construction of transmission lines, provide vectors for the introduction of invasive species. Cheatgrass, for example, is notorious for its ability to thrive in disturbed areas—common disturbances include construction, fire, floods, poor grazing activities, and intense recreation. Cheatgrass is hard to control once it becomes established. As this invasive weed begins to dominate an area, it alters native plant communities and displaces native plants thus impacting wildlife. Additional negative impacts include changes in soil properties, a decline in agricultural production, and altered fire frequencies. Cheatgrass is highly flammable and densely growing populations provide ample, fine-textured fuels that increase fire intensity and often decrease the intervals between fires. If fire should strike cheatgrass-infested land, native plant communities can be inextricably altered. This may result in erosion and damage to water resources. Cheatgrass poses a huge risk not only to our remaining intact rangeland ecosystems but also to human safety, particularly if climate change portends increased drought and hence more frequent fire.

N-005-011 RUS must ensure compliance with Executive Order 13112 on invasive species. Section 2 of the Executive Order requires all federal agencies to identify actions that may affect the status of invasive species and to then:

[u]se relevant programs and authorities to: (i) prevent the introduction of invasive species; (ii) detect and respond rapidly to and control populations of such species in a cost-effective and environmentally sound manner; (iii) monitor invasive species populations accurately and reliably; (iv) provide for restoration of native species and habitat conditions in ecosystems that have been invaded; (v) conduct research on invasive species and develop technologies to prevent introduction and provide for environmentally sound control of invasive species; and (vi) promote public education on invasive species and the means to address them

Moreover, the Executive Order requires federal agencies to:

not authorize, fund, or carry out actions that it believes are likely to cause or promote the introduction or spread of invasive species in the United States or elsewhere unless, pursuant to guidelines that it has prescribed, the agency has determined and made public

N-005-011: NEPA Process (In Review)

Your email/letter/comment form has been received and your comment noted. Tri-State Generation and Transmission Association, Inc. has requested financial assistance from the USDA Rural Utilities Service (RUS), for their anticipated ownership interest in the proposed San Luis Valley – Calumet - Comanche Transmission Project. RUS has determined that funding Tri-State's ownership interest is a federal action requiring analysis under the National Environmental Policy Act (NEPA).

RUS is the lead federal agency for NEPA, and will consult with other federal, state, and local agencies, and affiliated tribes as well as adhere to applicable regulations.

Additional information regarding the NEPA process can be found on the RUS project website at <http://www.usda.gov/rus/water/ees/envIRON.htm>. The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

its determination that the benefits of such actions clearly outweigh the potential harm caused by invasive species; and that all feasible and prudent measures to minimize risk of harm will be taken in conjunction with the actions.

In short, RUS must consider whether it is more effective and efficient, ecologically and economically, to avoid certain ground-distributing activities in order to ensure compliance with the provisions of the Executive Order.

N-005-012 To prevent the spread of invasive species and preserve native species and plant communities, at a minimum, RUS should:

- Reduce surface disturbance to the smallest possible footprint.
- Require that trucks and other equipment be cleaned before entering the construction area.
- Require that any fill material used be free of non-native seeds or other noxious weed material.

Native plants should be used in all restoration and revegetation projects.

4. Fire and fire policy

N-005-013 Transmission lines may provide a new fire source. RUS should address issues related to fires and fire policy. RUS should:

- Provide that fire suppression efforts and related vegetation management efforts (like thinning) are focused on the “wildland urban interface.” Remote areas should not be subject to mechanical vegetation management activities.
- Prohibit road building as a means to accomplish any vegetation treatments in furtherance of the fire policy. If “non-permanent” roads are allowed, there should be strict assurances such roads will be temporary.
- Be consistent with the Western Governors Association’s 10-year Comprehensive Wildfire Strategy prepared in 2001.

Riparian areas should be restored so that they can serve as natural firebreaks.

5. Mitigation and monitoring

In order for federal agencies to rely on mitigation to reduce potentially significant impacts, NEPA requires that the agencies make a firm commitment to the mitigation and discuss the mitigation measures “in sufficient detail to ensure that environmental consequences have been fairly evaluated...”⁴ NEPA defines “mitigation” of impacts (at 40 C.F.R. § 1508.20) to include:

⁴ *Communities, Inc. v. Busey*, 956 F.2d 619, 626 (6th Cir. 1992).

N-005-012: Environmental Consequences (In Review)

Your email/letter/comment form has been received and your comment noted. Potential environmental consequences and mitigation measures from the proposed project will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at

<http://www.usda.gov/rus/water/ees/ea.htm>.

N-005-013: Environmental Consequences (In Review)

Your email/letter/comment form has been received and your comment noted. Potential environmental consequences and mitigation measures from the proposed project will be addressed in the Environmental Impact Statement.

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- Avoiding the impact altogether by not taking a certain action or parts of an action;
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation;
- Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; or
- Compensating for the impact by replacing or providing substitute resources or environments.

Simply identifying mitigation measures, without analyzing the effectiveness of the measures violates NEPA. Agencies must “analyze the mitigation measures in detail [and] explain how effective the measures would be . . . A mere listing of mitigation measures is insufficient to qualify as the reasoned discussion required by NEPA.”⁵ NEPA also directs that the “possibility of mitigation” should not be relied upon as a means to avoid further environmental analysis. *Forty Most Asked Questions Concerning CEQ’s National Environmental Policy Act Regulations*.⁶

Mitigation measures often rely on adaptive management or deferred actions involving monitoring and then development of more specific management and mitigation. In order to fulfill the agency’s obligation to comply with NEPA’s requirements regarding mitigation measures, any permits for projects must include concrete commitments to specific actions, including definitive standards, timing, and details for actions that will be taken and a discussion of the basis for relying on their success, including the availability of funding.

N-005-014

N-005-015

Projects should only be approved along with a requirement for a detailed analysis of current inventory status to accompany the environmental analysis, which clearly specifies resources that may be affected by various activities and their baseline condition, then identify indicators for resources or groups of resources that will demonstrate the effects of RUS’s decisions.

II. CONCLUSION

N-005-016

Because of the potential impacts on vital wildlife habitats including winter concentration areas and severe winter relief areas for elk, roost sites and winter concentration areas for bald eagles, concentration areas and winter concentration areas for pronghorn, concentration areas and severe

⁵ *Northwest Indian Cemetery Protective Association v. Peterson*, 764 F.2d 581, 588 (9th Cir. 1985), *rev’d on other grounds*, 485 U.S. 439 (1988).

⁶ *See also Davis v. Mineta*, 302 F.3d 1104, 1125 (10th Cir. 2002).

N-005-014: Environmental Consequences (In Review)

Your email/letter/comment form has been received and your comment noted. Potential environmental consequences and mitigation measures from the proposed project will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at

<http://www.usda.gov/rus/water/ees/ea.htm>.

N-005-015: Environmental Consequences (In Review)

Your email/letter/comment form has been received and your comment noted. Potential environmental consequences and mitigation measures from the proposed project will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at

<http://www.usda.gov/rus/water/ees/ea.htm>.

N-005-016: NEPA Process (In Review)

Your email/letter/comment form has been received and your comment noted. Tri-State Generation and Transmission Association, Inc. has requested financial assistance from the USDA Rural Utilities Service (RUS), for their anticipated ownership interest in the proposed San Luis Valley – Calumet - Comanche Transmission Project. RUS has determined that funding Tri-State’s ownership interest is a federal action requiring analysis under the National Environmental Policy Act (NEPA). RUS is the lead federal agency for NEPA, and will consult with other federal, state, and local agencies, and affiliated tribes as well as adhere to applicable regulations.

Additional information regarding the NEPA process can be found on the RUS project website at <http://www.usda.gov/rus/water/ees/enviro.htm>.

The Environmental Impact Statement is anticipated to be completed in

N-005-016 | winter range for mule deer, and black-tailed prairie dog colonies, an EIS should be prepared for the construction of these transmission lines.

N-005-017 | Completion of an EIS will, NWF believes, encourage RUS to both minimize construction of new transmission lines and maximize the use of existing infrastructure for all energy corridors.⁷ NWF recommends that RUS use lands along existing interstate highways and U.S. highways, for example, as well as major secondary state-designated paved highways wherever feasible. RUS should encourage the use of existing infrastructure within already disturbed areas as much as possible. There are enormous advantages to this approach. It will reduce the overall financial costs of projects from planning to construction to maintenance. It will also reduce impacts to wildlife and sensitive lands since, to a great extent, the damage to wildlife habitat has already been done in these locations.

Sincerely,



Kathleen C. Zimmerman
Senior Policy Specialist

⁷ The western federal lands, for example, already contain thousands of miles of roads, pipelines, power lines, irrigation ditches, and the like. Section 1221(b) of the Energy Policy Act required the Secretaries of Agriculture, Energy, and Interior and the Chairman of the Council on Environmental Quality to prepare a report identifying all existing energy corridors or other transmission rights-of-way on federal land. The report, released in November 2005, indicates that there are thousands of such facilities.⁷ Nearly 6000 rights-of-way for transmission facilities will come up for renewal on National Forests and Bureau of Land Management lands alone within the next fifteen years. It is difficult to image that miles of new energy corridors must be constructed in as yet undisturbed areas.

late 2010 and will be available at
<http://www.usda.gov/rus/water/ees/ea.htm>.

N-005-017: Route Refinement (In Review)

Your email/letter/comment form has been received and your comment noted. Route refinement for the proposed project and mitigation measures will be addressed in the Environmental Impact Statement. The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at
<http://www.usda.gov/rus/water/ees/ea.htm>.